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Application **GRANTED**. The Pre-Settlement Conference Call scheduled for June 25, 2024 is **ADJOURNED to Tuesday, August 13, 2024 at 2:00 p.m.**

June 21, 2024

SO ORDERED.

VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007

Ona T. Wang **6/24/24**
U.S.M.J.

Re: *Z.S. et al. v. N.Y.C. Dep't of Educ.*, 24-cv-1441 (MMG)(OTW)

Dear Magistrate Judge Wang:

We represent Defendant in the above-referenced action wherein Plaintiffs seek attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. §1400, *et seq.*, as well as for this action.

We write to respectfully request the adjournment of the Pre-Settlement Conference Call ("Conference") scheduled for June 25, 2024, before Your Honor, to August 8, 2024, or to a future date convenient to the Court. Plaintiffs consent to this request. This is the first request for an adjournment of the Conference.

While Defendant is diligently moving on an expedited basis, we are facing delays with respect to processing this matter and need additional time to obtain authority to commence settlement negotiations. The requested adjournment will give Defendant the necessary time to finalize this matter for settlement and engage in settlement negotiations with Plaintiffs' counsel. We note that this office and the Law Department continue to settle the majority of the IDEA fees-only cases brought by plaintiffs represented by the Kule-Korgood firm in recent years without the need to burden the Court with any motion practice or conferences, and the parties are optimistic that this matter will take the same course.

Accordingly, Defendant respectfully requests that the Court adjourn the Conference to August 8, 2024, or to a future date convenient to the Court.

Thank you for considering this request.

Respectfully Submitted,

/s/ Vivian Rivera Drohan
Vivian Rivera Drohan, Esq.

cc: Michele Kule-Korgood, Esq. (via ECF)